

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
	)	
Plaintiff,	)	<b>THE UNITED STATES' UNOPPOSED</b>
	)	<b>MOTION TO MODIFY RULE 17 SUBPOENAS</b>
v.	)	
	)	
MICHAEL RICHARD LYNCH and	)	
STEPHEN KEITH CHAMBERLAIN,	)	
	)	
Defendants.	)	

For the reasons set forth below, the United States hereby moves to modify the Rule 17 subpoenas issued by the Court on June 8, 2022. On that date, the Court issued seven (7) Rule 17 Subpoenas to Testify and Produce Documents or Objects in a Criminal Case. Document 122. Three of the persons to whom the Rule 17 subpoenas were issued -- Gary Szukalski, Rob Sass, and Nicole Eagan -- reside in the United States and have been served with the Rule 17 subpoenas (the "Subpoena Recipients"). The Subpoena Recipients have each retained counsel.

The language of the original Rule 17 subpoenas requested the following documents: "Please produce all documents relating in any way to Count Seventeen (pages 13-15) of the attached

THE UNITED STATES' UNOPPOSED MOTION TO MODIFY RULE 17 SUBPOENAS  
CASE NO. CR 18-577 CRB

Superseding Indictment in *United States v. Lynch and Chamberlain*, Case No. 18-CR-577 CRB, including all such documents that reference Michael Lynch, Steven Chamberlain, Autonomy, Hewlett Packard (“HP”), Invoke Capital, Darktrace, possible employment, and any other possible benefits.” Document 122 at 34.

In good faith, counsel for the Subpoena Recipients conferred with government counsel about certain issues relating to the language of the original subpoenas. For example, counsel for the Subpoena Recipients asked whether compliance with the subpoenas required a legal interpretation of the allegations in the underlying indictment.

Thereafter, counsel for the Subpoena Recipients and counsel for the government conferred about modifying the language of the document request in the Rule 17 subpoenas to address these issues. Modification of the language of the subpoenas may obviate the need for litigation around the interpretation and obligations of the original subpoenas.

Counsel for the government and the Subpoena Recipients settled on the modified language set forth in the attached seven (7) Rule 17 subpoenas. These modified subpoenas would be issued to the same seven (7) persons to whom the original Rule 17 subpoenas were issued but, if ordered by the Court, would utilize the modified document request language to which both government counsel and the counsel for the Subpoena Recipients have agreed.

Counsel for the government has conferred about this motion with counsel for defendant Stephan Chamberlain. Defendant Chamberlain does not oppose this motion.

For these reasons, the United States respectfully requests that the Court issue the seven (7) Rule 17 subpoenas in the form attached hereto.

DATED: February 17, 2023

Respectfully submitted,

STEPHANIE M. HINDS  
United States Attorney

/s/ Adam A. Reeves

ADAM A. REEVES  
Assistant United States Attorney

THE UNITED STATES’ UNOPPOSED MOTION TO MODIFY RULE 17 SUBPOENAS  
CASE NO. CR 18-577 CRB

# Rule 17 Subpoena

## Rob Sass

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Rob Sass

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			4/7/2023 09:00

☒ You are also commanded to bring with you the following document(s) or object(s):

PLEASE SEE ATTACHMENT A

NOTE: Subpoena forms for the production of documents or objects at or in advance of the trial, hearing or proceeding at which the items are to be offered in evidence (CAND 89B, *Subpoena to Produce Documents or Objects in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's Internet site: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

02/17/2023

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Adam A. Reeves

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____		
DATE		SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

ATTACHMENT A

For the period October 2011 to November 30, 2018, please produce any and all non-privileged documents relating in any way to the following:

1. The actual or possible employment, hiring, or retention (including any agreement for work in exchange for money) of the subpoena recipient by any entity or person controlled by or affiliated at any time with Michael Lynch;
2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

Rule 17 Subpoena  
Poppy Prentiss  
(aka Poppy Gustafsson)

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Poppy Prentiss (aka Poppy Gustafsson)

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

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Adam A. Reeves

Tel. (415) 436-7200

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Stephanie M. Hinds  
United States Attorney



CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

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SERVED	DATE	PLACE
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SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		
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2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena

## Peter Menell

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Peter Menell

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			4/7/2023 09:00

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

02/17/2023

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Adam A. Reeves

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;">DATE</div> <div style="text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
<b>ADDITIONAL INFORMATION</b>		

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3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena

## Nicole Eagan

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Nicole Eagan

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			4/7/2023 09:00

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

02/17/2023

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Adam A. Reeves

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney



CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO    AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; text-align: center;">DATE</div> <div style="width: 45%; text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
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3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena

## Lisa Harris

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Lisa Harris

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

02/17/2023

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

*Adam A. Reeves*

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;">DATE</div> <div style="text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
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5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
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# Rule 17 Subpoena

## Gary Szukalski

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Gary Szukalski

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*Adam A. Reeves*

Tel. (415) 436-7200

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Stephanie M. Hinds  
United States Attorney



CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

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SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO    AMOUNT \$
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1. The actual or possible employment, hiring, or retention (including any agreement for work in exchange for money) of the subpoena recipient by any entity or person controlled by or affiliated at any time with Michael Lynch;
2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena Corrado Broli

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Corrado Broli

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			4/7/2023 09:00

☒ You are also commanded to bring with you the following document(s) or object(s):

PLEASE SEE ATTACHMENT A

NOTE: Subpoena forms for the production of documents or objects at or in advance of the trial, hearing or proceeding at which the items are to be offered in evidence (CAND 89B, *Subpoena to Produce Documents or Objects in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's Internet site: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

02/17/2023

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Adam A. Reeves

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;">DATE</div> <div style="text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
<b>ADDITIONAL INFORMATION</b>		

ATTACHMENT A

For the period October 2011 to November 30, 2018, please produce any and all non-privileged documents relating in any way to the following:

1. The actual or possible employment, hiring, or retention (including any agreement for work in exchange for money) of the subpoena recipient by any entity or person controlled by or affiliated at any time with Michael Lynch;
2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.